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EX PARTE OR LATE FILED

February 2, 2000

RECEIVED

FEB 02 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: *Ex Parte Presentation*
Numbering Resource Optimization
CC Docket No. 99-200

Dear Ms. Salas:

This letter serves as notification that on February 1, 2000, Andrea Cooper and Luisa Lancetti (representing AirTouch Communications, Inc.), had a meeting with Yog Varma, Tejal Mehta and Aaron Goldberger (of the Common Carrier Bureau), and David Furth, Blaise Scinto and John Spencer (of the Wireless Telecommunications Bureau) to discuss issues concerning the above-captioned proceeding. AirTouch reiterated its view that a strong federal presence with respect to numbering matters remains essential and the Company discussed issues specific to wireless carrier number optimization. AirTouch also presented a proposed "format" for collection of carrier utilization data. The need for uniform, coordinated efforts was stressed.

AirTouch also provided further information concerning the numbering crisis in California and issues pertaining to suspension of the 424 overlay and lottery procedures (for non-LNP capable carriers). In this regard, AirTouch has since learned that the California Public Utilities Commission ("CPUC") has now determined to "reduce" the number of codes issued in the 310 NPA, by allocating two codes only every other month. A copy of the letter notification from the CPUC and copies of the presentation material distributed and discussed at the *ex parte* meeting are attached hereto.

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Pursuant to Section 1.1206(a), an original and one copy of this letter are being filed with your office. Please associate this letter with the file in the above-captioned proceeding.

Please contact us should you have questions concerning the foregoing.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By: Luisa L. Lancetti
Counsel for AirTouch Communications, Inc.

Attachments

cc: Yog Varma
Tejal Mehta
Aaron Goldberger
David Furth
Blaise Scinto
John Spencer

AIRTOUCH™

Numbering Resource Optimization

(CC Docket No. 99-200)

Ex Parte Presentation

AirTouch Communications, Inc.

February 1, 2000

AIRTOUCH™

FCC Must Exercise Its Plenary Authority Over Numbering

- Consumers should not lose access to phone service because states mishandle delegated numbering authority or depart from national guidelines
- FCC should confirm commitment to strong federal oversight of public numbering resources, as mandated by Congress
- FCC must make clear it will take steps needed to ensure numbers are available
- FCC should exercise close oversight after states are delegated authority and must intervene when states do not carry out their numbering obligations after delegation of authority
- Immediate FCC action is necessary, in some cases, to ensure communities do not run out of numbers in the short term (*e.g.*, California – 310 NPA)

AIRTOUCH State Approaches Will Not Always Suffice

- For example, in California NPA 310, exhaust is near
  - Rate center proliferation, rejection of overlays, reluctance to require 10-digit dialing contribute to near-term number exhaust
- Suspension of 424 overlay for 310 and lack of relief plan implementation is leading to exhaust
  - Pooling "trial" no solution for NPA exhaust: NANPA projects need for 30 NXXs for pooling, but only 16 available
  - Insufficient NXXs available for non-LNP rationing
- Number exhaust is *real* — and *imminent*
  - NANPA advises that total exhaust may be reached in 310 within 9 months
  - There will be a number availability gap when that occurs
    - CPUC has not yet acted on back-up NPA relief plan
    - CPUC 3rd revised draft plan (a split) calls for 9 month implementation

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What *Should* Be Done?

- Protect interests of consumers in obtaining phone numbers by ensuring carriers can provide them
- Intervene and require immediate area code relief (overlay) when states do not act in a timely manner (*i.e.*, numbers becoming unavailable in 90 days or less)
- Empower NANPA to enforce numbering guidelines and order states to follow the national guidelines
- Reinforce that number pooling "trials" and other interim measures are not sufficient; area code relief is essential
  - Ensure that state number pooling "trials" do not divert numbering resources from non-LNP-capable carriers, contrary to FCC requirements
  - Facilitate rate center consolidation or wide area rate centers (*e.g.*, N.Y.)

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Possible Short-Term Solution

- When codes will shortly become unavailable to non-LNP-capable carriers (*i.e.*, wireless), mandate establishment of a "wireless-first" overlay
  - Accommodate immediate growth needs of wireless carriers
  - Allow remaining codes in old NPA to be pooled by LNP carriers
  - Provide additional codes for LNP carriers from overlay code, once existing numbers exhausted (*i.e.*, overlay is not technology- or service-specific)
  - "Take-backs" cannot be part of a wireless-first overlay, both because they are competitively discriminatory and because of adverse effect on existing customers
- Overlay can be implemented much faster than split, making near-immediate relief possible
- Permissive 10-digit dialing acceptable

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What Should *Not* Be Done?

- Pooling is *not* an immediate solution to area code exhaust
- The 11/02 deadline for CMRS carriers to become LNP-capable should *not* be accelerated
  - Technical complexity and roaming issues remain
  - Diversion of investment from build-out to LNP capability is contrary to the public interest
  - Wireless pooling does not bring area code relief because CMRS carriers use codes efficiently
- States should *not* be authorized to implement wireless-only overlays, which are discriminatory and anticompetitive
- States should *not* be allowed to depart from national numbering guidelines

STATE OF CALIFORNIA GRAY DAVIS, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 28, 2000

To: NANPA CO Code Administration,
310 and 424 Code Holders, and
Service List for R.95-04-043, I.95-04-044

RE: Change in the Code Allocation for the February and future lotteries for the 310 NPA

By Assigned Commissioner Ruling dated November 15, 1999, a number pooling trial was established in the 310 NPA, with the March 18, 2000 date set for the pool to be implemented. The CPUC further determined that, once the 310 number pool is established, all LNP-capable carriers will be authorized to draw numbers only from the number pool in blocks of 1,000. Thus, beginning with the February 2000 lottery, only non-LNP-capable carriers will continue to be able to draw entire NXX codes in the monthly 310 lottery. This will result in a much smaller number of carriers participating in the 310 lottery and a smaller number of applications for codes from this lottery.

Telecommunications Division staff has consulted with the assigned commissioner's office and determined that, because of this likely reduction in the number of applications for codes in the 310 NPA, it is in the public interest to reduce the number of codes issued in the 310 NPA. By this letter, I am providing notice to carriers that the 310 lottery will allocate two (2) codes every other month. In other words, in February the 310 lottery will allocate two (2) codes (1 initial, 1 growth) to carriers, the March lottery will allocate zero (0) codes, and so forth in alternate months into the future. All other existing lottery rules and procedures will remain in effect. As a reminder, carriers will still need to submit documentation demonstrating that they meet the imminent exhaust criteria for each 310 NPA monthly lottery.

If you have any questions, please call Bob Benjamin at (415) 703-1069.

Sincerely,

John Leutza
Director, Telecommunications Division

cc: Commissioner Lynch
ALJ Pulsifer

INSTRUCTIONS FOR COMPLETING THE UTILIZATION STUDY FOR THE 310 NPA

California Public Utilities Commission (CPUC) Decision 99-09-067 and subsequent Administrative Law Judge Rulings mandated a study of NXX code utilization in increments of 1,000 for each NXX code assigned within the 310 NPA. All telecommunications carriers who have been assigned full NXX codes and/or portions of them via Type 1 agreeements are required to report how the numbers are being used in accordance with the following objectives and parameters by no later than December 22, 1999.

Lockheed Martin CIS, in collecting the 310 utilization data from carriers and providing both raw and aggregate utilization study data to the CPUC, will be acting as an agent of the CPUC. As the CPUC's agent, Lockheed Martin CIS is bound by California statutes and CPUC rules governing the treatment of confidential and/or proprietary information submitted to Lockheed Martin CIS pursuant to the 310 utilization study.
Each carrier must submit the utilization data requested to Lockheed Martin CIS in both electronic and hard copy formats. Lockheed Martin CIS will furnish each telecommunications carrier with an electronic Excel spreadsheet with the forms to be used by that carrier to submit the utilization data. The CPUC retains exclusive control over the 310 utilization data. Lockheed Martin CIS may not share the raw data or any data products (such as data summaries, aggregations, etc.) with any entity other than the CPUC, including other parts of Lockheed Martin such as the North American Numbering Plan Administrator (NANPA), unless authorized to do so in writing by the CPUC.

I. STUDY OBJECTIVES:

1) To identify blocks of numbers for number pooling and other conservation measures and reallocate numbering resources among carriers;

2) To test assumptions about the need for area code relief;

3) To determine the efficient use of numbers within NXX codes;

4) To get a clear understanding of what telephone numbers are actually "in use;"

5) To evaluate carriers' needs for numbering resources; and

6) To fulfill legislative mandate.

II. STUDY PARAMETERS:

1) Categories that numbers are reported in must all be mutually exclusive;

2) Data will be collected by Service Provider, OCN, CPUC Utility Number, COC type, NPA, Rate Center and Thousand Block;

3) Yes or no data on whether the NXX is portable;

4) Yes or no data on whether the NXX is dedicated to a special use, such as Time, Weather, High Volume Calling, etc.;

5) The following **CATEGORIES** are specified for **SECTION I** (for use by **all** service providers (SPs)) and **SECTION II** (for **Wireless** SPs):

SECTION I is for use by all SPs for reporting **all** numbers **with the exception of** Type 1 numbers; and

SECTION II is for use by **Wireless** SPs for reporting **Type 1** Numbers:

See **"DEFINITIONS FOR 310 UTILIZATION STUDY"** for detailed explanations of the categories.

5a) **CATEGORIES - SECTION I (for all SPs)**

A) ***Assigned Numbers***
1. **Working**
2. **Non-Working Wireless**
3. **Service Orders Pending**
4. Total Assigned Numbers (The numbers is sub parts 1, 2 and 3 should total and be reported in 4.)

B) ***Administrative Numbers***
1. ***Internal Business Purpose/Official Numbers***
2. ***Test Numbers***
3. ***Other Administrative Numbers*** (include only Location Routing Number, Temporary Local Directory Number and Wireless E911 ESRD/ESRK)
4. ***Total Administrative Numbers*** (The numbers in sub parts 1, 2 and 3 should total and be reported in 4.)

C) ***Reserved Numbers***
1. Numbers reserved for **180 days or less**
2. Numbers reserved for **181 to 365 days**
3. Numbers reserved for **over 365 days**
4. ***Total Reserved Numbers*** (The numbers in sub parts 1, 2 and 3 should total and be reported in 4.)

D) ***Aging***
1. ***Residential Service***
2. ***Business Service***
3. ***Total Aging Numbers*** (The numbers if sub parts 1 and 2 should total and be reported in 3.)

E) ***Available Numbers*** {All numbers that do not fit into the "Unavailable Numbers" categories (above) and includes numbers in dealer pools and "soft dial tone" numbers - also known as "warm dial tone" numbers.}

5b) **CATEGORIES - SECTION II (for wireless SPs reporting Type 1 Numbers)**

A) ***Assigned Numbers***
1. **Working**
2. **Non-Working Wireless**
3. **Service Orders Pending**
4. **Total Assigned Numbers** (The numbers is sub parts 1, 2 and 3 should total and be reported in 4.)

B) ***Administrative Numbers***

1. ***Internal Business Purpose/Official Numbers***
2. ***Test Numbers***
3. ***Other Administrative Numbers*** (include only Location Routing Number, Temporary Local Directory Number and Wireless E911 ESRD/ESRK)
4. ***Total Administrative Numbers*** (The numbers in sub parts 1, 2 and 3 should total and be reported in 4.)

C) ***Reserved Numbers***

1. Numbers reserved for **180 days or less**
2. Numbers reserved for **181 to 365 days**
3. Numbers reserved for **over 365 days**
4. ***Total Reserved Numbers*** (The numbers in sub parts 1, 2 and 3 should total and be reported in 4.)

D) ***Aging***

1. ***Residential Service***
2. ***Business Service***
3. ***Total Aging Numbers*** (The numbers if sub parts 1 and 2 should total and be reported in 3.)

E) ***Available Numbers*** {All numbers that do not fit into the "Unavailable Numbers" categories (above) and includes numbers in dealer pools and "soft dial tone" numbers - also known as "warm dial tone" numbers.}

5c) **OTHER REPORTED INFORMATION**

A) At the end of Section I, there is space for SPs to report any NXXs that have been assigned to them but not pre-populated. SPs should include all of the above reporting categories for these NXXs.
B) In Section II of the spreadsheet, Wireless SPs should report any blocks of Type 1 numbers that they have received from another SP. SPs should report the NXX code associated with each block and should report on all the above reporting categories for these blocks.

6) ***ADDITIONAL INFORMATION (For use by all SPs):***

A) Each SP can choose a date between November 1 and November 30, 1999 to frame its report on. Each SP must report they date the chose.
B) In the Type 1 Category, donating SPs must identify to which SP they assigned Type 1 numbers. If Type 1 recipient SPs fail to fill in how they are using the Type 1 numbers they have received, then a mechanism for follow-up is provided.
C) All SPs must provide the quantity of numbers in the assigned category that have been dedicated to Interim Local Number Portability (INP). SPs do not have to identify the quantity on a thousand block basis, but instead shall report the total quantity of assigned numbers dedicated to INP for the entire 310 NPA.
D) If an SP answered "Yes" that it has an NXX code dedicated to Special Use, it must identify the purpose for which each NXX code is dedicated. For example, indicate which NXX codes are dedicated to time; which to weather; which to high volume calling, etc.
E) SPs must identify their policies for aging numbers by the number of days under each of the following scenarios:

1) How long does the SP age residential numbers in non-jeopardy situations?
2) How long does the SP age business numbers in non-jeopardy situations?
3) How long does the SP age residential numbers in jeopardy situations?
4) How long does the SP age business numbers in jeopardy situations?

7) ***OTHER INFORMATION:***

A) Service Providers must submit their data by close of business on December 22, 1999 in both hardcopy and electronic format to Lockheed Martin IMS-CIS.

B) Submit the data to:

Lockheed Martin IMS-CIS
Mary H. Ensminger
Numbering Analyst
1120 Vermont Avenue, NW - Suite 550
Washington, DC 20005

mary.ensminger@npac.com

202/533-2652 - voice
202/887-0331 - fax

C) Lockheed Martin IMS-CIS will provide the CPUC with written notification of SPs who are non-compliant with utilization reporting by no later than January 1, 2000.

DATE DUE: DECEMBER 22, 1999

310 NPA

RATE CENTER_____

SERVICE PROVIDER_____

INFORMATION									ASSIGNED				ADMINISTRATIVE				RESERVED				AGING			AVAILABLE	
OCN	CPUC Utility Number	COC Type	LNP?	Special Use?	Rate Center	NPA	NXX	X	Working	Non-Work'g Wireless	Svc Ord Pndg	TOTAL	Internal/Official	Test	Other	TOTAL	<=180 Days	181-365 Days	>365 Days	TOTAL	RES	BUS	TOTAL	TOTAL	Contamination 10% or Less
						310		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								Total>>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10000	
						310		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								Tota>>I	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10000	
						310		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1000	Yes
								Total>>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10000	

PART I-SECTION 1
Page 1

CONFIDENTIAL

DEFINITIONS FOR 310 UTILIZATION STUDY

Administrative: An administrative number is one which is not or should not be assigned to a customer because it is in one of the following categories:

- **Internal Business Purpose/Official Numbers**: A number assigned by a service provider for its own internal business purposes
- **Test Numbers**: Telephone numbers (TNs) assigned for inter- and intra-network testing purposes
- **Other Administrative numbers** (include only Location Routing Number, Temporary Local Directory Number and Wireless E911 ESRD/ESRK) where
    - **Identical to a Local Routing Number (LRN)**: The ten-digit (NPA-XXX-XXXX) number assigned to a switch/point of interconnection (POI) used for routing in a permanent local number portability environment
    - **Temporary Local Directory Number (TLDN)**: A number dynamically assigned on a per call basis by the serving wireless service provider to a roaming subscriber for the purpose of incoming call setup
    - **Wireless E-911 ESRD/ESRK:** A ten-digit number used for the purpose of routing an E911 call to the appropriate Public Service Answering Point (PSAP) when that call is originating from wireless equipment. The ESRD identifies the cell site and sector of the call origination in a wireless call scenario. The Emergency Services Routing Key (ESRK) uniquely identifies the call in a given cell site/sector and correlates data that is provided to a PSAP by different paths, such as the voice path and the Automatic Location Identification (ALI) data path. Both the ESRD and ESRK define a route to the proper PSAP. The ESRK alone, or the ESRD and/or Mobile Identification Number (MIN), is signaled to the PSAP where it can be used to retrieve from the ALI database, the mobile caller's call-back number, position and the emergency service agencies (e.g., police, fire, medical, etc.) associated with the caller's location. If a NANP telephone number is used as an ESRD or ESRK, this number cannot be assigned to a customer.
    - For convenience, "other administrative numbers" are reported as a group for purposes of the 310 Utilization Study

Aging Numbers: An aging number is a number in the aging process. Aging is the process of making a disconnected telephone number unavailable for re-assignment to another subscriber for a specified period of time. An aging interval includes any announcement treatment period, as well as the vacant telephone number intercept period. A number is disconnected when it is no longer used to route calls to equipment owned or leased by the disconnecting subscriber of record. For purposes of the 310 Utilization Study, carriers are to separately report aging numbers associated with residential service from those associated with business service.

Assigned Numbers: An assigned number is a number that is: (a) working in the public switched telephone network (PSTN) under an agreement (e.g., tariff, contract) at the request of a specific customer for that customer's use, (b) for non-working wireless or (c) not yet working but has a customer service order pending, where:

- **Non-Working Wireless**: As defined in the Utilization Study, this category is for wireless companies only to report numbers that they have already assigned to customer equipment, but are not yet working. For example, cellular carriers often pre-package a cellular telephone with an assigned telephone number for sale to customers. Those phone numbers are assigned, but are not actually activated until after the customer purchase is made.

Available Numbers: Telephone numbers available for assignment are numbers within existing codes (NXX) or blocks (NXX-X) that are available for assignment to subscriber access lines or their equivalents within a switching entity/point of interconnection (POI), and are not categorized as assigned, administrative, aging, reserved, or Type 1. Vacant, Soft Dial Tone and Deal Number Pool numbers are considered telephone numbers available for assignment where

- **Vacant Number**: An unassigned telephone number that is not in service within a central office code (NXX) which has been activated.
- **Soft Dial Tone**: A number in soft dial tone is a number temporarily assigned to line equipment and facilities which permits restricted dialing (e.g., operator, 911, service provider business office). This is also known as warm dial tone.
- **Deal Number Pool**: A dealer numbering pool is a set of numbers allocated by a service provider to a retail dealer for use in the sale and establishment of service on behalf of that service provider.

COC Type: Three-digit element defining the use of the Central Office Code (codes such as 0XX used for access tandem and testboard addressing or a "+" symbol that indicates direct routing to the designated switch in the NPA. 2XX-9XX values are considered NXXs.)
Allowable codes in the LERG Destination Code by LATA and Tandem Homing Arrangements (LERG 6/9) are:

ATC = Access Tandem Code (0/1XX)
CDA = Customer Directory Assistance only (555 line numbers are assigned by the North American Numbering Plan Administration)
EOC = End Office Code
PLN = Planned Code - non-routable
PMC = Public Mobile Carrier (Type 2 Interconnected)
RCC = Radio Common Carrier (Dedicated Type 1 Interconnected)
SIC = Special 800 Service Code
SP1 = Service Provider - Miscellaneous Service (Type 1 Interconnected)
SP2 = Service Provider - Miscellaneous Service (Type 2 Interconnected)
TST = Standard Plant Test Code

Allowable codes in the LERG Oddball file (LERG6ODD only) are:

700 = 700 IntraLATA Presubscription
AIN = Advanced Intelligent Network
BLG = Billing Only
BRD = Broadband
CTV = Cable Television
ENP = Emergency Preparedness
FGB = Feature Group B Access
HVL = High Volume
INP = Information Provider
LTC = Local Test Code
N11 = N11 Code
ONA = Open Network Architecture
PRO = Protected
RSV = Reserved
RTG = Routing Only
UFA = Unavailable for Assignment

CPUC Utility Number: An utility identification number provided by the California Public Utilities Commission to a registered/certificated utility operating in California

Interim Number Portability (INP): The interim ability to move telephone service from one service provider to another service provider using Remote Call Forwarding (RCF), Direct Inward Dialing (DID), or equivalent means where:

- Remote Call Forwarding allows a customer to have a local telephone number in a distant location. Every time someone calls that number, that call is forwarded to the RCF customer in the distant location. Remote call forwarding is similar to call forwarding on a residential line, except that the RCF customer has no phone, no office and no physical presence in that location.
- A DID (Direct Inward Dial) trunk is a trunk from the Central office which passes the last two to four digits of the Listed Directory Number into the PBX, thus allowing the PBX to switch the call to and thus ring the correct extension" without the use of an attendant (Newton's Telecom Dictionary). Existing DID retail service is limited to PBX services. For purposes of providing INP, Pacific and GTEC will use the DID switch functionality to provide INP to any CLC customer regardless of the type of terminal equipment used on the customers' premises.
- For the purposes of the 310 Utilization Study, each carrier must report the quantity of its assigned numbers that are dedicated to providing INP.

Local Number Portability: The ability to move a telephone number from one service provider to another service provider using LRN-LNP technology

OCN: The Operating Company Number (OCN) assigned by the National Exchange Carrier Association (NECA) that identifies providers of telecommunications services. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCN's. Companies with no prior CO Code or Company Code assignments should contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company codes may be associated with a given company, telecommunications providers with multiple OCNs are required to report all OCNs related to service in the 310 NPA for the purposes of the utilization study.

Reserved Numbers: Reserved numbers are those that have been set-aside for future specific use. Using the parameters provided by North American Numbering Council, the Number Resource Optimization Working Group has identified the following characteristics that help define a reserved number:

- A reserved number is a non-working number
- A reserved number has been set aside by a service provider at the request of a specific end user for that end user's future use, and the service provider has confirmed and documented the reservation to the end user
- The reserved status of a telephone number is reflected in the records of the service provider in whose inventory the numbers are being reserved
- The name of the party requesting the reservation is in the service provider's administration system
- A reserved number has some restrictions such as duration and quantity
- A reserved number is portable where portability is applicable and the reserved number is associated with working numbers.
- The reserved telephone numbers to which these guidelines apply are those numbers in the 10-digit NANP number format (NPA-NXX-XXXX) within existing geographic central office (NXX) codes.

Assigned numbers with service order pending are not included in the definition of Reserved numbers. For the purposes of the 310 Utilization Study, carriers shall report reserved numbers according to how long they have been held.

Special Use NXX Codes: Certain NXX codes have traditionally been reserved or designated for special uses, and have not been available for assignment by carriers for general commercial use in providing telephone numbers to customers. These NXX prefixes are restricted to such special uses as recorded public information announcements of time-of-day and weather forecasts, high-volume call-in numbers, and emergency access numbers used by the Federal Emergency Management Administration (FEMA), etc.

Type 1 Numbers: numbers pursuant to a Type 1 interconnection agreement. The Type 1 interconnection is a connection between a mobile/wireless service provider and an end office of another service provider for the purpose of originating and terminating traffic or for access to end user services (i.e. DA, Operator services, 911, etc). The interconnection consists of a facility between the mobile/wireless service provider and the end office, switch usage, and telephone numbers (only required if the mobile carrier wishes to receive originating (L/M) traffic). For the purposes of the 310 Utilization Study, both mobile/wireless service providers who have received Type 1 numbers and those service providers who have provided Type 1 numbers to mobile/wireless service providers are asked to report on those numbers at the 1000 block level.